

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:

EX PARTE APPLICATION OF
IRAQ TELECOM LIMITED FOR AN
ORDER TO OBTAIN DISCOVERY FOR
USE IN FOREIGN PROCEEDINGS
PURSUANT TO 28 U.S.C. § 1782

Case No. _____

**IRAQ TELECOM LIMITED’S *EX PARTE* APPLICATION PURSUANT TO 28 U.S.C. §
1782 FOR AN ORDER TO TAKE DISCOVERY FROM DECHERT LLP FOR USE IN
FOREIGN PROCEEDINGS**

Iraq Telecom Limited (“**Iraq Telecom**” or the “**Applicant**”), pursuant to 28 U.S.C. § 1782 and the Federal Rules of Civil Procedure 26, 34 and 45, respectfully requests that this Court grant Iraq Telecom’s *ex parte* application seeking an order in the form attached as Exhibit 4 to the declaration of Kristin N. Tahler (“**Tahler Decl.**”) authorizing Iraq Telecom to obtain certain limited discovery¹ for use in (1) a pending arbitration administered by the International Chamber of Commerce; and (2) a contemplated proceeding in the United Kingdom.

In support of this application, Iraq Telecom submits a Memorandum of Law and the appended sworn declarations of (1) Cyrus Benson; (2) Nicholas Bortman; (3) Matthew Bunting; (4) Ehab Fekri Aziz Bassilios; and (5) Kristin Tahler, with accompanying exhibits.

* * *

¹ See Tahler Decl., attached hereto as Appendix D, at Exhibits 2 & 3.

Dated: November 5, 2019

By:

SKARZYNSKI MARICK & BLACK, LLP

James Sandnes
PA Bar Number: 41721
One Battery Park Plaza
New York, New York, 10004
(212) 820-7700
jsandnes@skarzynski.com

-and-

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

Kristin Tahler*
Lauren H. Dickie*
Kristin Casey*

1300 I Street NW, Suite 900
Washington, District of Columbia 20005-3314
(202) 538-8000

**Pro Hac Vice* to be submitted.

Counsel for Applicant, Iraq Telecom Limited